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INTERNATIONAL, INC., A DIVISION OF URS
CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**IN RE: KATRINA CANAL BREACHES
CONSOLIDATED LITIGATION**

PERTAINS TO: MRGO

**(PENDING IN THE UNITED STATES
DISTRICT COURT FOR THE EASTERN
DISTRICT OF LOUISIANA AS CIVIL
ACTION NO. 05-4182 "K" (2) BEFORE
HON. STANWOOD R. DUVAL, JR.),**

Defendant.

**Case No. MISC. NO. 08-CV-
80007MISC (PJH)**

**STIPULATION AND [PROPOSED]
ORDER WITHDRAWING ALL
DISCOVERY MOTIONS**

Date: April 16, 2008
Time: 10:00 a.m.
Courtroom: G, 15th Floor
Judge: Hon. Bernard Zimmerman

WHEREAS, the Court has currently scheduled a hearing on the pending Discovery Motions (i.e. the January 22, 2008 MR-GO PSLC Motion to Quash WGII ILIT Subpoena and Contemporaneous Motion to Stay Production; the February 5, 2008 WGII Cross-Motion to Compel UC-Berkeley to Comply with WGII ILIT Subpoena served in connection with MR-GO litigation; the February 14, 2008 MR-GO PSLC Motion to Quash WGII Bea Subpoena in Barge and Contemporaneous Motion to Stay Production; and the February 28, 2008 WGII Cross-Motion to Compel Bea to Comply with WGII Bea Subpoena served in connection with Barge litigation (collectively the "Discovery Motions")) for April 16, 2008 at 10:00 a.m.;

WHEREAS, through mutual effort the Parties have resolved the outstanding issues and

documents responsive to Washington Group International, Inc.'s ("WGII") individual and organizational subpoenas have been produced;

WHEREAS, this mutual resolution has mooted the Discovery Motions and any need for the April 16, 2008 hearing;

IT IS HEREBY STIPULATED AND AGREED, subject to Court approval, that the various Discovery Motions are hereby collectively withdrawn by the parties.

Dated: March 26, 2008

/s/ Aaron L. Agenbroad
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Dated: March 26, 2008

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1 Dated: March 26, 2008

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Attorney for U.C. Berkeley and Professors
Reimer, Seed, Pestana and Bray

[PROPOSED] ORDER

The Court, having considered the above stipulation of the parties, and good cause appearing, hereby ORDERS that:

- the January 22, 2008 MR-GO PSLC Motion to Quash WGII ILIT Subpoena and Contemporaneous Motion to Stay Production;
- the February 5, 2008 WGII Cross-Motion to Compel UC-Berkeley to Comply with WGII ILIT Subpoena served in connection with MR-GO litigation;
- the February 14, 2008 MR-GO PSLC Motion to Quash WGII Bea Subpoena in Barge and Contemporaneous Motion to Stay Production;
- the February 28, 2008 WGII Cross-Motion to Compel Bea to Comply with WGII Bea Subpoena served in connection with Barge litigation; and
- any other associated motions or cross motions,

are hereby deemed withdrawn by the respective parties and the April 16, 2008 hearing date on these motions and cross motions is hereby VACATED.

IT IS SO ORDERED.

Dated: _____

HON. BERNARD ZIMMERMAN
United States Magistrate Judge